

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

SureFunding, LLC,

Debtor.

Chapter 11

Case No. 20-10953 (LSS)

**NOTICE OF APPEAL**

Noteholders<sup>1</sup> in the above-captioned bankruptcy case, through their undersigned counsel, and pursuant to 28 U.S.C. § 158(a) and Rules 8002(a) and 8003(a) of the Federal Rules of Bankruptcy Procedure, hereby appeal from the *Order Denying Noteholders' Motion for Order Converting this Case to Chapter 7* [Docket No. 232] (the "Order"), entered on January 24, 2023, a copy of which is attached hereto as Exhibit 1.<sup>2</sup> Noteholders submit this Notice of Appeal in conformity with Official Bankruptcy Form B417A.

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<sup>1</sup> "Noteholders" are Brett Hatton, an individual; Earl Coronel, an individual; Autumn Wind Global Multi-Strategies Fund, LP, a Delaware Limited Partnership; Damon Gersh, an individual; Jason Eckenroth, an individual; Sherri R. Sands, as trustee of the Sherri R. Sands Revocable Trust, a Florida Trust; Glickfield Capital Management, LLC fbo M. Glickfield Dynasty Trust, a Maryland Trust; Glickfield Capital Management, LLC fbo Cheryl Newmark, a Maryland Trust; Glickfield Capital Management, LLC fbo Marla Schram, a Maryland Trust; Carrickfergus Investments Limited, a British Virgin Islands Company; Stephane Carnot, as Trustee of the Carnot Family Trust, a District of Columbia Trust; Dorsey and Whitney Trust Co., LLC, as Trustee of the Dylan Taylor 2011 Grantor Trust, a South Dakota Trust; Eseco, LLC, a Michigan Limited Liability Company; Sequiris Group, LLC, a Michigan Limited Liability Company; Matthew Briggs, as Trustee of the Briggs Management Trust; Michael Rubenstein, an individual; June Farmer, an individual; Thomas Carl Myers, an individual; Richard L. Rogers, an individual; Neal J. Glickfield, as Trustee of the Neal J. Glickfield 2018 Trust, a Maryland Trust; Lineage, LLC, a Virginia Limited Liability Company; Charles B. Chokel, as Trustee of the Charles B. Chokel Trust u/a 4/21/92, a New Hampshire Trust; Brian Gray, an individual; HFJ Investments I, LLC, a Texas Limited Liability Company; Patricia B. Jones, as Trustee of the Patricia B. Jones Revocable Trust, a Maryland Trust; John B. Shaw as Trustee of the John B. Shaw 2012 Family Grantor Trust; and 1086 LLC, a Maryland Limited Liability Company.

<sup>2</sup> Given that the Order is a final order, leave to appeal is not required; however, if this Court were to determine otherwise, Noteholders request the ability to file a motion in support thereof in accordance with Federal Rule of Bankruptcy Procedure 8004(d).

**Part 1: Identify the Appellant**

1. Name of appellant: Noteholders.
2. Position of appellant in the adversary proceeding that is the subject of this appeal:

Secured Creditors.

**Part 2: Identify the Subject of this Appeal**

1. *Order Denying Noteholders' Motion for Order Converting this Case to Chapter 7*

[Docket No. 232].

2. Date of Entry of Order: January 24, 2023.

**Part 3: Identify the Other Parties to the Appeal**

1. Appellees: Debtor SureFunding, LLC.

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**Part 4: Optional election to have appeal heard by District Court (applicable only in certain districts)**

1. N/A

Dated: February 7, 2023  
Wilmington, Delaware

**BLANK ROME LLP**

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